

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Estate of John Patrick O'Neill Sr., et al. v. The Republic of Iraq, et al., 1:04-cv-01076 (GBD)(SN)
Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al., 1:04-cv-01923 (GBD)(SN)
Deborah Bodner, et al. v. Islamic Republic of Iran, No. 1:19-cv-11776 (GBD)(SN)

MOTION TO SUBSTITUTE COUNSEL

COME NOW, Deborah Temple, individually as spouse, and as Personal Representative of the Estate of Vincent Morello, deceased; Justin Morello, individually as surviving child of Vincent Morello, deceased; and Paige Morello, individually as surviving child of Vincent Morello; (“the Morello Plaintiffs”), Plaintiffs in *Deborah Bodner, et al. v. Islamic Republic of Iran, et al.*, No. 1:19-cv-11776 (GBD)(SN), *Estate of Patrick O'Neil Sr., et al. v. The Republic of Iraq, et al.*, No. 1:04-cv-01076 (GBD)(SN) and *Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al.*, 1:04-cv-01923 (GBD)(SN), and file this Motion to Substitute Counsel. As grounds for said Motion, the Morello Plaintiffs state as follows:

1. The Morello Plaintiffs were represented by Anderson Kill P.C., *et al.* (Motley Rice LLC, Kreindler & Kreindler LLC, Law Office of John M. Quin and Brian Ballard, Esq. - “*et al.*”). On February 19, 2024, by emails, the Morello Plaintiffs advised the Anderson Kill P.C. *et al.*, that they desired new counsel.
2. The Morello Plaintiffs thereafter retained John F. Schutty, Esq. of the Law Office of John F. Schutty, P.C. to represent them in this litigation.
3. The Morello Plaintiffs now ask the Court to substitute John F. Schutty, Esq. as

attorney of record as to the Morello Plaintiffs.

4. The Morello Plaintiffs, Anderson Kill P.C. *et al.*, and John F. Schutty, Esq., consent to the substitution of counsel as requested herein (signed Consents are attached to the accompanying Declaration of John F. Schutty, Esq. as part of a Stipulation & Consent Order, *see* Exhibit A).

WHEREFORE, PREMISES CONSIDERED, Deborah Temple, individually as spouse, and as Personal Representative of the Estate of Vincent Morello, deceased; Justin Morello, individually as surviving child of Vincent Morello, deceased; and Paige Morello, individually as surviving child of Vincent Morello, deceased, pray that this Honorable Court enter an Order substituting John F. Schutty, Esq. of Law Office of John F. Schutty, P.C. as attorney of record for the Morello Plaintiffs in *Deborah Bodner, et al. v. Islamic Republic of Iran, et al.*, No. 1:19-cv-11776 (GBD)(SN), *Estate of Patrick O'Neil Sr., et al. v. The Republic of Iraq, et al.*, No. 1:04-cv-01076 (GBD)(SN) and *Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al.*, 1:04-cv-01923 (GBD)(SN).

Dated: New York, New York
July 26, 2024

Respectfully Submitted,

/s/ *John F. Schutty*

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